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Via Hand Delivery

Mr. Bruce A. Franca
Mr. Gordon W. Godfrey
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

Re: Written Ex Parte Presentation In MM Docket No. 87-
268

Dear Messrs. Franca and Godfrey:

At our meeting on January 13, 1998, you asked Liberman Television, Inc., as the new owner of KRCA(TV), Riverside, California ("LTI"), to submit an ex parte filing detailing LTI's alternative requests for a new DTV allotment for KRCA(TV). On behalf of LTI, the following letter sets forth those requests. As this letter constitutes a written ex parte presentation under 47 C.F.R. § 1.1206(a), two copies are being submitted to the Secretary's office.

As you know, KRCA was assigned a DTV allotment of Channel 69 in the Sixth Report and Order. However, that allotment would be completely unusable because of interference involving adjacent channel land mobile operations. KRCA's prior owner, the shareholders of Fouce Amusement Enterprises ("Fouce"), filed a Petition for Reconsideration addressing this issue. Fouce also made two ex parte presentations to the Commission and submitted comments regarding the revisions to the Table of Allotments proposed by MSTV. However, because the sale of KRCA

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to LTI and its affiliates was just consummated on January 6, 1998, LTI, as the new owner of KRCA, wants to ensure that its own concerns about the station's DTV allotment are considered by the Commission in addressing the foregoing Petition for Reconsideration.

LTI has determined that assigning KRCA a new DTV channel allotment that requires moving KRCA's transmitter site from Sunset Ridge to Mt. Wilson would further several objectives in the public interest. First, it would satisfy the Commission's stated policy objective of ensuring that every eligible broadcaster receive a usable DTV channel. Second, it would improve the station's coverage of the Los Angeles market by 8.3 percent, thus promoting a more diverse DTV service in the Los Angeles market and in particular, making KRCA's Asian-language programming available to additional minority populations dispersed throughout the area. As we discussed in our meeting and as stated in Fouce's Comments in Response to MSTV And ALTV Filings (filed December 17, 1997; the "Fouce Comments"), the Mt. Wilson site allows stations to provide superior service -- in part because of the general receive antenna orientation patterns driven by the large number of stations that use the site. Third, as noted at pp. 6-7 of the Fouce Comments, by allowing KRCA and other broadcasters to operate from Mt. Wilson, certain potential DTV interference may be reduced. Finally, such a move would go some way toward redressing the unequal burden imposed upon KRCA by virtue of its having no core spectrum assignment (either NTSC or DTV) -- while 18 other stations in the Los Angeles market have at least one, and in many cases, two, core spectrum assignments. See pp. 3-4 and Attachment 1 of the Fouce Comments.

Given the foregoing, LTI proposes the following four options for its DTV allotment, in the order of preference:

1. LTI's first preference would be to change its NTSC allotment to Channel 68 and its DTV allotment to Channel 62, with both channels operating from Mt. Wilson. Because KRCA may not be able to provide 80dBu coverage to a small percentage of Riverside if it operates as an NTSC channel from Mt. Wilson, this option, which was proposed as "Alternative 1" in the Fouce Comments, may require a temporary waiver of 47 C.F.R. § 73.685(a) for KRCA's NTSC coverage.¹ However, such a temporary waiver would only be required for a short period of time during the DTV transition period. Under this option, KRCA would move its NTSC channel from

¹ A Mt. Wilson allotment would meet all FCC requirements for DTV coverage of Riverside.

Channel 62 to Channel 68 only after it receives a construction permit for its DTV channel and is ready to terminate broadcasting from Sunset Ridge on NTSC Channel 62. Moreover, full coverage of Riverside would be provided by KRCA's DTV Channel 62 during the period KRCA would broadcast from Mt. Wilson on NTSC Channel 68 pursuant to any temporary waiver that may be required.

2. LTI's second preference would be to change its NTSC allotment to Channel 68 and its DTV allotment to Channel 62, with the NTSC channel operating from Sunset Ridge and the DTV channel operating from Mt. Wilson. This alternative would be more expensive because it would require the station to operate from two transmitter sites. However, it would avoid any possible need for a waiver of 47 C.F.R. § 73.685(a).

As explained at p. 7 in the Fouce Comments, because KRCA currently broadcasts on Channel 62, Options 1 and 2 would require the Commission to specify a dual allocation in the DTV table (DTV Channel 62*/68, Riverside, Calif.) and a corresponding dual allocation in the subsequently amended NTSC table (NTSC Channel 68*/62, Riverside, Calif.), with an explanation that the asterisked new allocation is to be effective, pursuant to a grant of the necessary construction permits, as of KRCA's termination of NTSC operations on Channel 62.

3. LTI's third preference would be to maintain its current NTSC allotment of Channel 62 and change its DTV allotment to Channel 68, with both channels operating from Mt. Wilson. This proposal was made in the Fouce Comments as "Alternative 2." As discussed above under Option 1, this alternative may require a temporary waiver of 47 C.F.R. § 73.685(a). In addition, this alternative apparently would require a waiver of 47 C.F.R. § 73.610(d) because of the operation of Channel 58 at Mt. Wilson. (The channel assignments contemplated by the other three options discussed in this letter would comply fully with the Commission's spacing requirements for UHF stations without the need for a waiver.)

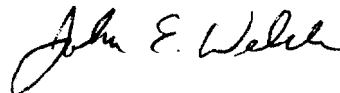
4. LTI's fourth preference would be to maintain its current NTSC allotment of Channel 62 at Sunset Ridge and change its DTV allotment to Channel 68, operating from Mt. Wilson. Again, this alternative would be more expensive because it would require the station to operate at two transmitter sites. However, it would avoid any possible need for a waiver of 47 C.F.R. § 73.685(a) or 47 C.F.R. § 73.610(d).

The following table summarizes the four options discussed above:

<u>Option</u>	<u>NTSC Allotment</u>	<u>DTV Allotment</u>
1	68 (Mount Wilson)	62 (Mount Wilson)
2	68 (Sunset Ridge)	62 (Mount Wilson)
3	62 (Mount Wilson)	68 (Mount Wilson)
4	62 (Sunset Ridge)	68 (Mount Wilson)

We hope the above comments have been helpful and would be happy to provide any further information or comments at your convenience. If you have any questions, please do not hesitate to call.

Sincerely,



John E. Welch
Jessica Davidson Miller

cc: Chairman William E. Kennard
Commissioner Harold Furchtgott-Roth
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Gloria Tristani
Ms. Susan Fox
Ms. Jane Mago
Mr. Paul Jackson
Mr. Lenard Liberman
Mr. Chris Buchanan
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